

July 5, 2011

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: ET Docket No. 08-59, Amendment of the Commission's Rules to Provide
Spectrum for the Operation of Medical Body Area Networks

Dear Ms. Dortch,

On June 30, 2011, representatives of Philips Healthcare ("Philips"), GE Healthcare ("GE"), and the Aerospace & Flight Test Radio Coordinating Council ("AFTRCC") (together, the "Joint Parties") participated in a teleconference call with staff of the Commission's Office of Engineering and Technology ("OET"). The teleconference participants are listed in the Attachment to this letter.

Participants at this meeting discussed four specific elements of their Joint Proposal submitted in this docket on January 13, 2011, as further discussed and refined in later filings.

- Protection for radio astronomy quiet zones was discussed, including in particular the planetary research radar at Arecibo, P.R. The Commission's "Quiet Zone" requirements, Section 1.924 of the Commission's Rules,¹ provide that for services in which individual station licenses are not issued by the FCC,² a new station at a permanent fixed location that may cause interference to operations of the Arecibo Observatory must be notified to the Arecibo Observatory's Interference Office at least 45 days in advance of operations. The station may initiate operation after 45 days of notification if no objection is made, or sooner if the Interference Office provides written consent to the planned operation. Under the Joint Proposal, MBANS transmitters operating in the 2360-2390 MHz band will be deployed only inside healthcare facilities and limited to 1 mW EIRP, while those operating in 2390-2400 MHz may be more widely deployed and limited to 20 mW EIRP. These very low

¹ 47 C.F.R. § 1.924 (2010).

² MBANS stations would be licensed by rule under Part 95 of the Commission's Rules if established as proposed in the Joint Proposal.

radiating powers are substantially below those permitted for Part 15 unlicensed devices generally and, combined with the orientation parameters of the Arecibo facility and its remote location, limit the potential radius for interference. We recognize that future MBANS operations will have to be in compliance with Section 1.924.

- The difference between the 24-hour period in proposed draft rule 95.615(g)(D) and the immediate cessation in MBANS operations in the 2360-2390 MHz band that would be required by draft rule 95.615(g)(E) was discussed. The 24-hour provision of 95.615(g)(D) applies when an AMT operator requires access to spectrum that was coordinated for MBANS use, and therefore the 24-hour requirement is sufficient. By contrast, the “immediate cessation” provision of 95.615(g)(E) relates to unexpected interference at AMT, in which event immediate action is necessary.
- Airborne operation limited to the 2390-2400 MHz segment is foreseen for uses such as air ambulances. There would not be any airborne use below 2390 MHz. Since as proposed the availability of MBANS devices will be controlled by duly authorized healthcare professionals, such airborne use will be limited in nature.
- Additional discussion addressed use of the term “LOS” in draft section 95.1615(g)(D). The use of this term in this context is intended to include propagation factors that exist in real-world environments.

Marlene H. Dortch, Secretary
July 5, 2011
Page 3

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being electronically filed in Docket ET 08-59 and emailed to all FCC staff participants. Questions may be directed to David Siddall at the address below.

Respectfully Submitted,

_____/ S /_____
David R. Siddall, Esq.
Counsel to Philips Healthcare
DS Law, PLLC
1717 Pennsylvania Ave. NW, Ste 1025
Washington, DC 20006
(202) 559-4690

_____/ S /_____
Ari Q. Fitzgerald, Esq.
Counsel to GE Healthcare
Hogan Lovells US LLP
555 Thirteenth St. NW
Washington, DC 20004
(202) 637-5600

_____/ S /_____
William K. Keane, Esq.
Counsel to AFTRCC
Duane Morris LLP
505 Ninth St. NW, 9th Flr
Washington, DC 20004
(202) 776-7800

Attachment: Attendees

ATTACHMENT

Attendees on FCC Teleconference June 30, 2011

FCC Office of Engineering and Technology (OET)

Jamison Prime
Brian Butler

Aerospace & Flight Test Radio Coordinating Council (AFTRCC)

Ken Keane
Dan Jablonski
Tom Fagan
Darryl Holtmeyer
Danny Hankins
Marc Ehudin

GE Healthcare (GE)

David Davenport
Neal Seidl

Philips Healthcare (Philips)

David Siddall
Delroy Smith
Dong Wang